

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
)
) Case No. 22-10584 (CTG)
)
 FIRST GUARANTY MORTGAGE)
 CORPORATION, *et al.*,¹) (Jointly Administered)
)
)
 Debtors.)
)
) **Related Docket Nos. 518, 525, 625**

**NOTICE OF FILING OF BLACKLINE OF AMENDED, MODIFIED AND RESTATED
COMBINED DISCLOSURE STATEMENT AND CHAPTER 11 PLAN OF FIRST
GUARANTY MORTGAGE CORPORATION AND DEBTOR AFFILIATE**

PLEASE TAKE NOTICE that on October 6, 2022, First Guaranty Mortgage Corporation and Maverick II Holdings, LLC, the above-referenced affiliated debtors and debtors in possession (together, the “Debtors”), filed the *Amended Chapter 11 Combined Plan & Disclosure Statement of First Guaranty Mortgage Corporation and Debtor Affiliate* [D.I. 518] (the “Combined Plan”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that on October 7, 2022, the Debtors filed the Solicitation Version of the Combined Plan [D.I. 525] with Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE that on October 31, 2022, the Debtors filed the *Amended, Modified and Restated Chapter 11 Combined Plan & Disclosure Statement of First Guaranty Mortgage Corporation and Debtor Affiliate* [D.I. 652] (the “Modified Combined Plan”) with Bankruptcy Court.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors' mailing address is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

PLEASE TAKE FURTHER NOTICE that on October 31, 2022, the Bankruptcy Court conducted a hearing (the “Confirmation Hearing”) to consider approval of the disclosures in the Combined Plan on a final basis and confirmation of the Modified Plan. At the Hearing, the parties advised the Bankruptcy Court of certain nonmaterial changes to be made to the Modified Plan.

PLEASE TAKE FURTHER NOTICE that contemporaneously herewith, the Debtors filed the revised *Amended, Modified and Restated Chapter 11 Combined Plan & Disclosure Statement of First Guaranty Mortgage Corporation and Debtor Affiliate* [the “Restated Combined Plan”).

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 3016-1 of the Local Rules for the United States Bankruptcy Court for the District of Delaware, a blackline comparison of the Restated Combined Plan marked against the Modified Combined Plan is attached hereto as **Exhibit A.**

Dated: November 2, 2022

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